

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE

WORLDWIDE DIGITAL)	
ENTERTAINMENT, LLC;)	
PIRACY RECOVERY, LLC,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:13-CV-136
)	
MELLOW MUSHROOM OF)	
JOHNSON CITY, LLC, et al,)	
)	
Defendants.)	

MOTION TO DISMISS OR IN THE ALTERNATIVE TO SEVER

Mellow Mushroom of Johnson City, LLC, by counsel, moves the Court pursuant to Federal Rules of Civil Procedure 12(b)(6), 20 and 21 to dismiss this matter or in the alternative to sever for the reasons stated in the accompanying memorandum.

MELLOW MUSHROOM OF JOHNSON CITY, LLC

By Counsel

Cameron S. Bell
BPR No. 21388
Penn, Stuart & Eskridge
P.O. Box 2288
Abingdon, Virginia 24212
(276) 628-5151
(276) 623-1730 (facsimile)
cbell@pennstuart.com

By /s/ Cameron S. Bell
Cameron S. Bell

CERTIFICATE OF SERVICE

I hereby certify that on July 18, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Michael Robinson, Esq., Matthew M. Googe, Esq., Michael J. Bradford, Esq., counsel for plaintiff, and Kelli L. Thompson, counsel for Quality Restaurant Concepts, LLC., and via U.S. mail to the following:

Woodstone Deli and Sports Grill
3500 Fort Henry Drive
Kingsport, TN 37664

Neil McMurray
d/b/a Just 4 Kix Karaoke
1603 Lynn Garden Drive
Kingsport, TN 37665

Michael McMurray
d/b/a Krackerjack Karoke
1907 Park Street
Kingsport, TN 37664

Scully's Bar & Grill, Inc.
3103 N. Roan Street
Johnson City, TN 37601

Conley's Overlook LLC
112 Tory Lane
Kingsport, TN 37660

Todd Dolehanty
1309 Holly Court
Bristol, TN 37620

Ronald Hutchins
d/b/a Star Search Karaoke
1608 Highpoint Ave.
Kingsport, TN 37665

Jeffery D's Sports N'Cigar Bar
1403 Bluff City Highway
Bristol, TN 37620

Biggies TN LLC
417 W. Stone Drive
Kingsport, TN 37660

Numan's Café & Sports Bar
225 E. Main Street
Johnson City, TN 37604

Joshua Fields
d/b/a Nite Life Karaoke
1725 Jefferson Ave.
Kingsport, TN 37664

Kingsport Lodge No. 972, Loyal Order of Moose
301 East Main Street
Kingsport, TN 37660

Hulsing Hotels Tennessee, Inc.
101 Springbrook Drive
Johnson City, TN 37604

Hackler-Wood Post No. 145, Incorporated
515 Marion Avenue
Bristol, TN 37620

Emma Cole
d/b/a Karoke Klub and/or
d/b/a Karoke With Emma
1403 Charity Hill Road
Elizabethton, TN 37643

Mike Butler
d/b/a Paradise Productions and Entertainment
332 R. Miller Road
Piney Flats, TN 37686

Bob Eaton
d/b/a Night Train Karaoke
214 Douglas Chapel Road
Jonesborough, TN 37659

/s/ Cameron S. Bell
Cameron S. Bell